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13 | *Attorneys for Intervenor-Defendant  
Sable Offshore Corp.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

## CENTER FOR BIOLOGICAL DIVERSITY, et al.,

*Plaintiffs,*

V<sub>a</sub>

DEBRA HAALAND, et al..

### *Defendants,*

and

## SABLE OFFSHORE CORP..

### *Intervenor-Defendant.*

CASE NO. 2:24-cv-05459-FMO-MAA

**DECLARATION OF DANIEL P.  
BRUNTON IN SUPPORT OF SABLE  
OFFSHORE CORP.'S OPPOSITION  
TO PLAINTIFFS' MOTION FOR  
LEAVE TO FILE FIRST  
SUPPLEMENTAL AND  
AMENDED COMPLAINT**

## Hearing

Date: February 7, 2025

Date: February  
Time: 1:30 p.m.

Date: 1/30/2019  
Judge: Hon. Michelle Williams Court  
Courtroom: 6A

1                   **DECLARATION OF DANIEL P. BRUNTON**

2 Pursuant to 28 U.S.C. § 1746(2), I, Daniel P. Brunton, hereby declare:

3                   1. I am an attorney licensed to practice law in the State of  
4 California, a member of this court, and am Counsel at Latham & Watkins LLP,  
5 counsel of record for Intervenor-Defendant Sable Offshore Corp. (“Sable”) in the  
6 above captioned action. I have personal knowledge of the matters recited herein,  
7 and if called upon to testify concerning them under oath, I could and would testify  
8 thereto.

9                   2. A true and correct copy of the “Categorical Exclusion Review  
10 for Sable Offshore Well HE-23 – Reperforations” and “Sable Offshore Well HE-  
11 28 – Reperforations” are attached hereto as **Exhibit A** and **Exhibit B**, respectively.

12                  3. A true and correct copy of the applications for permit to modify  
13 (“APMs”) for Well HE-23 and HE-28 are attached hereto as **Exhibit C** and  
14 **Exhibit D**, respectively.

15                  4. The Bureau of Safety and Environmental Enforcement’s  
16 (“BSEE”) approvals of Sable’s APMs have been publicly available on the internet  
17 since at least October 12, 2024, when I reviewed them on the following website:  
18 [https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-  
19 applications-for-permit-to-modify-apm](https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-applications-for-permit-to-modify-apm).

20                  Dated: January 17, 2025

21                  \_\_\_\_\_  
22                  /s/ *Daniel P. Brunton* \_\_\_\_\_  
23                  Daniel P. Brunton